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**UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF NEW YORK**

ROTTEN RECORDS, INC.

Plaintiff,

v.

JOHN DOE subscriber assigned IP address
67.253.216.226,

Defendant.

Civil Action No. 6:15-cv-06650-FPG

**PLAINTIFF'S EX-PARTE MOTION FOR A 90 DAY ENLARGEMENT OF TIME TO
SERVE COMPLAINT ON JOHN DOE DEFENDANT**

The plaintiff Rotten Records, Inc. ("Plaintiff") respectfully moves *ex-parte* for an order pursuant to Federal Rule of Civil Procedure 4(m) to enlarge the period of time to effectuate service of the Complaint by 90 days, until May 25, 2016. Plaintiff has acted diligently to identify the anonymous John Doe infringer, but requires additional time to obtain subscriber records and to complete its preliminary investigation to confirm its good faith basis to bring suit against the individual associated with the internet protocol ("IP") address identified in the complaint. In support of its Motion, Plaintiff relies on its Memorandum of Law.

Respectfully submitted,
Plaintiff, Rotten Records, Inc.
By its attorneys,

/s/ John E. Young

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Dated: February 2, 2016

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CERTIFICATE OF SERVICE

The undersigned, counsel for the Plaintiff, hereby certifies that a copy of the foregoing was filed electronically and served by mail on anyone unable to accept electronic filing. Notice of this filing will be sent by e-mail to all parties by operation of the court's electronic filing system or by mail to anyone unable to accept electronic filing as indicated on the Notice of Electronic Filing. Parties may access this filing through the court's CM/ECF System.

/s/ John E. Young
John E. Young, Esq.